UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION)))	MDL No. 2738 (MAS) (RLS)
This document relates to: Christina Arendale- 3:23-cv-18578)	

PLAINTIFF'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE

The below undersigned counsel of record for Plaintiff Christina Arendale submits the following Response to the Court's August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On September 8, 2024, the undersigned filed suit directly into MDL No. 2738 on behalf of Plaintiff Christina Arendale. Pursuant to the Court's Amended Plaintiff Profile Form Order dated September 1, 2023, a Plaintiff Profile Form, medical records and signed authorizations were to be served on Defendants by December 7, 2023. Following the filing of the lawsuit, the undersigned counsel mailed the PPF and corresponding authorizations to Plaintiff Arendale for completion.

The undersigned counsel made multiple attempts to contact Plaintiff Arendale to confirm she received the PPF in the mail and to answer any questions she may have regarding the documents in an effort to comply with the December 7, 2023 deadline. All attempts to reach the Plaintiff were unsuccessful. Following the passage of the PPF deadline in December, the undersigned continued our contact attempts and sent three (3) letters to Plaintiff Arendale warning her that her case would be dismissed if she did not comply with the Court's Amended PPF Order. Those letters were sent to Plaintiff Arendale via regular US Mail and certified mail. We have certified mail receipts confirming Plaintiff Arendale signed for one letter in January of 2024 and

she signed for another letter in June of 2024. In addition to the letters, the undersigned counsel continued to attempt to contact Plaintiff Arendale repeatedly by telephone, email and text message up to today's date with no success in an effort to comply with the Court's Order. However, to date, Plaintiff Arendale refuses to cooperate and the undersigned counsel has not received a completed PPF.

Based on the foregoing, the undersigned is unable to offer facts or argument in opposition to the Order to Show Cause.

Date: September 4, 2024 Respectfully submitted,

/s/ Andrea L. Sapone

Andrea L. Sapone Wright McCall, LLC 5707 W. Interstate 10 San Antonio, TX 78201 Telephone: 205-558-9000 asapone@wrightmcccall.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2024, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access the filing through the Court's system.

Dated: September 4, 2024

/s/ Andrea L. Sapone Andrea L. Sapone